



State of Ohio Environmental Protection Agency

FILE COPY

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P.O. Box 1049
Columbus, OH 43216-1049

March 17, 2008

Mr. Chuck Lagasse
GI Plastek
5 Wickers Drive
Wolfeboro, NH 03894

**Re: Gi Plastek
Cessation of Regulated Operation
OHD004301818
Union County, CDO
Return To Compliance**

Dear Mr. Lagasse:

On March 11, 2008, Ohio EPA, Division of Hazardous Waste Management, Central District Office Staff conducted a follow-up Cessation of Regulated Operation (CRO) Inspection of GI Plastek's facility in Marysville, Ohio. We inspected GI Plastek to determine its compliance with Ohio's CRO rules as found in Chapter 3745-352 of the Ohio Administrative Code (OAC) or Chapter 3752 of the Ohio Revised Code (ORC). Our inspection included a walk - through of the 692 Clymer Road building which previously contained regulated substances. These regulated substances were shipped on January 07, 2008, by the Penn Ohio Corp 4813 Woodman Avenue, Ashtabula, Ohio 44004 and the hazardous waste was shipped on December 28, 2007, to Chemtron Corporation, 35850 Schneider Court, Avon, Ohio 44011.

Mr. Royce Jennings the owner of two of the buildings at 648 Clymer Road and leased by GI Plastek in Marysville accompanied me on the original CRO inspection on April 23, 2007. There were a few regulated substances left in the two buildings and these have since been given away to a cleaning company along with the two tanks.

Mr. Ike Habib, P.E., the contact person on the 30 day CRO form accompanied me on the facility walk through of 692 Clymer Road. The 90 day CRO form along with the bill of lading for the regulated substances, the hazardous waste manifest, a certification statement signed by you, a map of where the transformer with non-PCB oil will remain during sale of the facility were submitted as documentation of CRO.

My review of the documentation reveals that GI Plastek has now abated all violations discovered during the April 23, 2007, inspection as listed below.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Ohio EPA is an Equal Opportunity Employer

Mr. Chuck Lagasse
GI Plastek
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Letter Citation #	Rule Citation
1.	<i>OAC Rule 3745-352-35 (D) and ORC 3752.05 (D), Contact Person</i>
2.	<i>OAC Rule 3745-352-20 (A) (2) (h) and ORC 3752.06 (A) (6), Responsibilities as Owner or Operator</i>
3.	<i>OAC Rule 3745-352-20 (A) (2) (a) (b) (c) (d) and ORC 3752.06 (A), Responsibilities as Owner or Operator</i>
4.	<i>OAC Rule 3745-352-30 (A) (B) (C) and ORC 3752.07, Security and Warning Signs</i>

We did not identify any further violations during the March 11, 2008 CRO inspection at the 692 Clymer Road building. Therefore, GI Plastek has satisfactorily completed the CRO regulatory process for its Marysville, Ohio facility. As a notifier of regulated waste activity (conditionally exempt small quantity generator of hazardous waste), we will deactivate your EPA identification number.

Enclosed you will find a copy of the checklist that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (614-728-5036). You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Chris Bulinski
Environmental Specialist
Central District Office
Division of Hazardous Waste Management

Enclosure

c: Tammy McConnell, DHWM/CO
CDO File
Union County LEPC
Marysville Fire Department
Royce Jennings
Ralph McGinnis DHWM/CO

CB/nsm CROlettergiplastekRTC

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

CESSATION OF REGULATED OPERATIONS CHECKLIST

<input checked="" type="checkbox"/> Permanent Cessation	<input type="checkbox"/> Temporary Discontinuation	<input type="checkbox"/> Requesting Waiver for Temporary Discontinuation
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Company: GI Plastek EPA ID#: OHD004301818

Street: 648/692 Clymer Road City: Marysville

County: Union State: Ohio Zip: 43040

Mailing Address: _____
(If different from above)

Telephone Number: _____ Fax Number: _____

Owner/ Operator: GI Plastek

Street: 5 Wickers Drive City: Wolfeboro

County: _____ State: NH Zip: 03894

Telephone Number: _____ Fax Number: _____

Contact Person: Chuck Lagassee

Street: 5 Wickers Drive City: Wolfeboro

County: _____ State: NH Zip: 03894

Telephone Number: 617-803-0081 Fax Number: _____

If the following applies, check the appropriate box and provide information:

<input type="checkbox"/> Holder of First Mortgage	<input type="checkbox"/> Fiduciary	<input type="checkbox"/> Receiver	<input type="checkbox"/> Indenture Trustee
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Name : _____

Street: _____ City: _____

County: _____ State: _____ Zip: _____

Telephone Number: _____ Fax Number: _____

Inspection Date(s): _____ Time(s): _____

Inspection Announced: YES NO If so, how much advance notice given?: _____

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone Number</u>
Inspectors:	<u>Chris Bulinski</u>	<u>Ohio EPA</u>	<u>614-728-5036</u>
Facility Rep(s)	<u>Ike Habib, P.E.</u>	<u>HB Engineering, Inc.</u>	<u>440-230-1500</u>

30-DAY REQUIREMENTS

1. Did the owner/operator of the reporting facility submit a notice of the cessation of all regulated operations (CRO) on a form prescribed by the Director to the following within 30 days of CRO? [ORC 3752.04 and OAC rule 3745-352-20(A)(1)(a)]
- a. Director of Ohio EPA Yes No N/A RMK# _____
- b. Local Emergency Planning Committee Yes No N/A RMK# 1.
- c. Local Fire Department Yes No N/A RMK# 2.
2. Did the owner/operator designate a contact person? [ORC §3752.05 and OAC rule 3745-352-20(A)(1)(c)] Yes No N/A RMK# _____
3. Did the owner/operator include the following information about the contact person? [ORC §3752.05(B) and OAC rule 3745-352-35(B)] Yes No N/A RMK# _____
- a. Address of principal office of the owner/operator. Yes No N/A RMK# _____
- b. Business or residence address. Yes No N/A RMK# _____
- c. Telephone number of contact person. Yes No N/A RMK# _____
4. Has the contact person changed? [ORC §3752.05(C) and OAC rule 3745-352-35(D)] Yes No N/A RMK# _____
5. If the contact person changed his/her address or telephone numbers, did the owner/operator or contact person provide the Director with the new address or telephone number? [ORC §3752.05(D) and OAC rule 3745-352-35(D)] Yes No N/A RMK# _____

NOTE: The owner/operator is also required to secure the facility and post warning signs within 30 days of CRO. See pp 5-6 of this checklist.

REMARKS

- 1. I called the Emergency Management Agency in Union County but could not confirm if the form was submitted, they did not call back.**
- 2. I called the Marysville Fire Department but could not confirm if form was submitted so I faxed them a copy.**

90-DAY REQUIREMENTS [ORC §3752.06]

1. Did the owner/operator make a written certification to Ohio EPA's Director concerning the completion of the removal action within 90 days after CRO? [ORC §3752.06(A)(6) and OAC rule 3745-352-20(A)(2)(h)] Yes No N/A RMK# _____

NOTE: The owner/operator may receive approval from the Director to extend the 90-day period. [ORC §3752.06(B) and OAC rule 3745-352-20(A)(3)]

2. Does the owner/operator hold a **valid** hazardous waste facility installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program? [ORC §3752.06(C) and OAC rule 3745-352-20(A)(2)(g)] Yes No N/A RMK# _____

NOTE: If so, the owner/operator is not subject to CRO for its hazardous waste and must instead comply with the hazardous waste requirements.

3. Did the owner/operator submit to the Director a copy of the most recent emergency and hazardous chemical inventory form that was submitted to the State Emergency Response Commission (SERC), including a statement indicating whether any asbestos-containing materials are present at the facility? [ORC §3752.06(A)(1) and OAC rule 3745-352-20(A)(2)(a)] Yes No N/A RMK# 3.

4. Did the owner/operator submit to the Director a copy of the current hazardous chemical list or each material safety data sheet that the owner/operator is required to have on file with the SERC? [ORC §3752.06(A)(2) and OAC rule 3745-352-20(A)(2)(b)] Yes No N/A RMK# 3.

5. Did the owner/operator drain or remove all regulated substances from each stationary tank, vat, electrical transformer, and vessel and from all piping, that is to remain at the facility? [ORC §3752.06(A)(4) and OAC rule 3745-352-20(A)(2)(c)] Yes No N/A RMK# 3.

6. Did the owner/operator submit a list of every stationary tank, vat, electrical transformer, and vessel of any type that contains or is contaminated with regulated substances and that is to remain at the facility? [ORC §3752.06(A)(3) and OAC rule 3745-352-20(A)(2)(d)] Yes No N/A RMK# 3.

7. Did the owner/operator do the following?

a. Transfer the regulated substances to another facility owned or operated by the owner/operator? [ORC §3752.06(A)(4)(a) and OAC rule 3745-352-20(A)(2)(c)(i)] Yes No N/A RMK# 4

OR

b. Transfer ownership of the regulated substances to another person through sale or otherwise? [ORC §3752.06(A)(4)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)] Yes No N/A RMK# 4

OR

c. Transfer the regulated substances off-site in compliance with applicable and appropriate waste management laws? [ORC §3752.06(A)(4)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)] Yes No N/A RMK# 4

8. Did the owner/operator remove from the facility all debris, non-stationary equipment and furnishings, non-stationary containers, and motor vehicles and rolling stock that contain or are contaminated with a regulated substance? [ORC §3752.06(A)(5) and OAC rule 3745-352-20(A)(2)(c)] Yes No N/A RMK# 5

9. Did the owner/operator do the following:

a. Transfer the debris, equipment, furnishings, containers, and motor vehicles and rolling stock to another facility owned and operated by the owner/operator? [ORC §3752.06(A)(5)(a) and OAC rule 3745-352-20(A)(2)(c)(i)] Yes No N/A RMK# 5

OR

b. Transfer ownership of the debris, equipment, furnishings, containers, and motor vehicles, and rolling stock to another person through sale or otherwise? [ORC §3752.06(A)(5)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)] Yes No N/A RMK#

OR

c. Cause the debris, equipment, furnishings, and containers to be transported off-site in compliance with applicable and appropriate waste management laws and regulations? [ORC §3752.06(A)(5)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)] Yes No N/A RMK#

REMARKS

SECURITY & WARNING SIGNS - REQUIREMENTS OF OWNER/OPERATOR [ORC §3752.07 AND OAC RULE 3745-352-30]

1. Did the owner/operator secure the facility against unauthorized entry using one or more of the following as provided in OAC rule 3745-352-30(A)(1)-(5) within 30 days of CRO?
- a. Boarded, locked or used other means to secure all windows, doors and other potential means of entry? Yes No N/A RMK# 6.
 - b. Fencing? Yes No N/A RMK# 6.
 - c. Lighting and a surveillance system? Yes No N/A RMK# 6.
 - d. Guard or security service? Yes No N/A RMK# 6.
 - e. Notarized statement from the county sheriff's department or the local police stating that the security measures secure against unauthorized entry? Yes No N/A RMK# 6.
 - f. Demonstrated to the satisfaction of the Director or his/her designee that the proposed security measures secure against unauthorized entry? Yes No N/A RMK# 6.
2. Did the owner/operator post the appropriate warning signs in the following fashion within 30 days of CRO? [ORC §3752.07(A) and OAC rule 3745-352-30:
- a. Prohibit trespassing and state: "The building, structure, or outdoor location of operations contains or is contaminated with regulated substances that may endanger public health or safety if released into the environment." [OAC rule 3745-352-30(B)] Yes No N/A RMK# 6.
 - b. Are warning signs posted on, or reasonable proximate to, the building, structure or outdoor location in sufficient number to alert people? [OAC rule 3745-352-30(B)] Yes No N/A RMK# 6.
 - c. Posted on, or reasonably proximate to, locations that contain ignitable regulated substances and include the language, "No Smoking?" [OAC rule 3745-352-30(B)(2)] Yes No N/A RMK# 6.
 - d. Legible from a distance of at least 25 feet? [OAC rule 3745-352-30(B)(3)] Yes No N/A RMK# 6.
 - e. Constructed to withstand weather and affixed to secure against removal? [OAC rule 3745-352-30(B)(4)] Yes No N/A RMK# 6.

3. Are entry barrier and warning signs maintained to secure against unauthorized entry by the following measures listed below: [OAC rule 3745-352-30(C)]

- a. Inspected weekly or as agreed by the Director or his/her designee, county sheriff's department or local police department? [OAC rule 3745-352-30(C)(1)] Yes ___ No X N/A ___ RMK# 6 ___
- b. The condition is recorded in an inspection log? [OAC rule 3745-352-30(C)(2)] Yes ___ No X N/A ___ RMK# 6 ___
- c. Prompt repair or replacement after discovery of damage, lost or removed? [OAC rule 3745-352-30(C)(3)] Yes ___ No X N/A ___ RMK# 6 ___

REMARKS

3. I checked with Jeff Beattie and he said a SERC report was never filed. There is a statement that no asbestos was present. The hazardous waste manifest for hazardous waste was included with the 90 day form. A bill of lading for the universal and non-hazardous waste was included with the 90 day form. A map was included with the 90 day form of where the nonPCB transformer with oil would remain.

4. The hazardous waste manifest for hazardous waste was included with the 90 day form. A bill of lading for the universal and non-hazardous waste was included with the 90 day form.

5. The electric tow motors were leased and were taken back by the company from which they were leased. Two tanks and the floor cleaner contents were also given to a cleaning company during this CRO.

6. Gi Plastek took measures to secure their building by repairing locks and installing a new garage door on the tunnel area. There is a no smoking sign on the chemical storage area.

ADDITIONAL MULTI-MEDIA QUESTIONS

If the owner/operator holds a valid hazardous waste installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program, the following four questions may apply.

- 1. If the facility has an U.S. EPA I.D. number, has the facility submitted a *Notification of Regulated Waste Activity* form? Yes X No¹
- 2. Were there any <90 day accumulation units for hazardous waste? Yes No X

List where unit(s) were/are: _____

- 3. Did the owner/operator close his facility in a manner that: [OAC 3745-66-11]
 - a. Minimizes the need for further maintenance? Yes No N/A X RMK# 7
 - b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the groundwater, or surface waters, or to the atmosphere? Yes No N/A X RMK# 7
 - c. Complies with the closure requirements of OAC rules 3745-66-10 to 3745-66-20, 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80, 3745-68-10, 3745-68-51, 3745-68-81 and 3745-69-04? Yes No² N/A X RMK# 7
- 4. During the partial and final closure periods, were all contaminated equipment, structures, and soil properly disposed of or decontaminated unless otherwise specified in OAC rules 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80 or 3745-68-10?
 - a. Were generated hazardous wastes handled in accordance with all applicable requirements of Chapter 3745-52 of the Administrative Code? Yes No N/A X RMK# 7

Every demolition of a facility requires notification to Ohio EPA or local air agency regardless of whether asbestos is involved as required by the National Emission Standard for Hazardous Air Pollutants (NESHAPS) Standard for Asbestos. Notification requirements are found in OAC 3745-20-03 and 40 CFR §61.145(b). The notification form is available from Ohio EPA's web page at <http://www.epa.state.oh.us/dapc/atu/atu.html#asbestos>.

5. Will any buildings be demolished? If yes: Yes No
 Has a *Notification of Demolition and Renovation* form been submitted? Yes³ ___ No⁴
6. Are there any wells on the property? Yes⁵ ___ No

If yes, where are the wells? I did a search on ODNRs web site and could not find a well. Mr. Habib said there had been a well years ago used for cooling water but it had too much iron in it for use.

 What are the wells used for?

7. Is there open dumping of solid waste on the property? Yes⁶ ___ No

REMARKS

7. Gi Plastek was a conditionally exempt small quantity generator and therefore not subject to generator closure

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1. In lieu of the facility now submitting a form, the inspector should submit a copy of the final CRO letter to Central Office's Regulatory and Information Services for I.D. deactivation.
 2. Supply the facility with the requirements for generator closure and tell them they must close the unit and have documentation that closure was completed (LQGs only).
 3. Check with the appropriate agency to determine if a form has been received.
 4. Supply the facility with a form and contact the appropriate agency stating that demolition will occur.
 5. If used for drinking water, let DDAGW know about the well.
 6. Let DSIWM know about the open dumping of solid waste.